

**cIN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

In re: )  
MONICA N. SANTOS, ) Bankruptcy Case  
Debtor. ) No. 18-13067-BFK  
WELLS FARGO BANK, NATIONAL )  
ASSOCIATION, AS TRUSTEE FOR BANC OF )  
AMERICA MORTGAGE SECURITIES, INC. )  
MORTGAGE PASS-THROUGH CERTIFICATES,)  
SERIES 2001-K )  
Movant, )  
v. )  
MONICA N. SANTOS, )  
Debtor, )  
and )  
KWASI A. KUBI, )  
Codebtor, )  
and )  
H. JASON GOLD, )  
Trustee, )  
Respondents. )

**TRUSTEE'S RESPONSE AND OPPOSITION TO MOTION FOR RELIEF FROM STAY**

COMES NOW, H. Jason Gold, the chapter 7 trustee ("Trustee"), and files this response

H. Jason Gold, Va. Bar No. 19117  
101 Constitution Avenue, NW, Suite 900  
Washington, DC 20001  
(202) 689-2800  
Trustee

and opposition to the Motion for Relief from Automatic Stay (the “Motion”), stating to the Court as follows:

1. As reflected on Schedule A, the Debtors own real property commonly identified as 904 Royal Elm Court, Herndon, Virginia 20170 (the “Property”).
2. The Section § 341 Meeting of Creditors was is scheduled for November 19, 2018. Until such time as the Trustee completes his investigation of the value of the Property and validity of the liens asserted against the Property, the Trustee opposes the relief from the automatic stay sought in the Motion.
3. The Trustee lacks sufficient information to form a response to the allegations in the Motion that cause exists to grant the relief sought in the Motion and therefore denies the same and demands strict proof.

4. UPON THE TRUSTEE’S FILING OF A REPORT OF NO DISTRIBUTION, THE MOVANT AND THE COURT MAY DEEM THE TRUSTEE’S OPPOSITION AS WITHDRAWN AND GRANT WHATEVER RELIEF THE COURT DEEMS APPROPRIATE.

WHEREFORE, having responded to the Motion, the Trustee prays (i) that the Court continue the hearing on the Motion until such time as the Trustee has had a chance to assess the value of the subject collateral and validity of the liens asserted against the subject collateral; (ii) that in the event that the Trustee files a Report of No Distribution, that the Trustee’s opposition be deemed withdrawn; and (iii) for such other and further relief as may be necessary.

Respectfully submitted,

H. JASON GOLD, TRUSTEE

H. JASON GOLD, TRUSTEE  
101 Constitution Avenue, NW, Suite 900  
Washington, DC 20001  
Telephone: (202) 712-2800  
Facsimile: (202) 712-2860

By: /s/ H. Jason Gold  
H. Jason Gold, Va. Bar No. 19117

*Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 1<sup>st</sup> day of November 2018 the foregoing Trustee's Response and Opposition to Motion for Relief from Stay was served via Notice of Electronic Filing CM/ECF and pursuant to applicable Standing Order upon:

Mary Balthasar Lake  
SHAPIRO & BROWN, LLP  
501 Independence Pkwy, Suite 203  
Chesapeake, VA 23320

Office of the US Trustee  
1725 Duke Street, Ste. 650  
Alexandria, VA 22314

Nathan A. Fisher  
Fisher-Sandler, LLC  
3977 Chain Bridge Road, #2  
Fairfax, VA 22030

Monica N. Santos  
904 Royal Elm Court  
Herndon, VA 20170

Kwasi A. Kubi  
904 Royal Elm Court  
Herndon, VA 20170

/s/ H. Jason Gold  
H. Jason Gold